



4001 Rodney Parham Drive • Little Rock, Arkansas 72212  
(501) 748-7000

**REDACTED FOR PUBLIC INSPECTION**

June 14, 2017

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: WC Docket No. 14-58, WC Docket No. 10-90**

Pursuant to Section 54.313 and 54.422 of the Federal Communications Commission's rules enclosed is the 2017 annual report and certifications for Windstream **Study Area Code 150113 located in New York**. A copy of this report is also being filed with the Universal Service Administration Company (USAC), relevant state public service commissions, and tribal governments.

Windstream redacted Section 54.313(h)(1) Rate Floor Data Update customer line/loop counts, which is not readily available to Windstream's competition. Release of this information would cause Windstream to reveal proprietary information that would cause damage to its competitive position.

Also redacted is form (710) Company Broadband Service Price Offerings. Windstream does not make this information available to the public in the format required by this report. Release of this data would be detrimental to Windstream as it would provide other broadband providers servicing these areas a competitive advantage.

Should you have any questions, please contact me via email at [jeff.l.heacox@windstream.com](mailto:jeff.l.heacox@windstream.com) or by phone at 501-748-5390.

Sincerely,

/s/ Jeff Heacox

Jeff Heacox  
Staff Manager Compliance Reporting

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	150113
<015> Study Area Name	WINDSTREAM RED JACKT
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Jeff Heacox
<035> Contact Telephone Number: Number of the person identified in data line <030>	5017485390 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	jeff.l.heacox@windstream.com
Form Type	54.313 and 54.422



**(300) Unfulfilled Service Request  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	150113
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<039> Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)  
\_\_\_\_\_  
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)  
\_\_\_\_\_  
Name of Attached Document

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	150113	
<015>	Study Area Name	WINDSTREAM RED JACKT	
<020>	Program Year	2018	
<030>	Contact Name - Person USAC should contact regarding this data	Jeff Heacox	
<035>	Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com	
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.		Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	25.01	
<420>	Complaints per 1000 customers for mobile voice		
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.		Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	11.08	
<450>	Complaints per 1000 customers for mobile broadband		

**(500) Compliance With Service Quality Standards and Consumer Protection Rules**  
**Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	150113
<015>	Study Area Name	WINDSTREAM RED JACKT
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jeff Heacox
<035>	Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		150113NY510 .pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	150113
<015> Study Area Name	WINDSTREAM RED JACKT
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Jeff Heacox
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<039> Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	150113NY610.pdf







**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	150113
<015> Study Area Name	WINDSTREAM RED JACKT
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Jeff Heacox
<035> Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<015>	Study Area Name	WINDSTREAM RED JACKT
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 150113NY1010.pdf

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Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 150113NY1030.pdf

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Name of Attached Document

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	150113
<015>	Study Area Name	WINDSTREAM RED JACKT
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jeff Heacox
<035>	Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	150113
<015>	Study Area Name	WINDSTREAM RED JACKT
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jeff Heacox
<035>	Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans	150113NY1210.pdf          Name of Attached Document
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<1220> Link to Public Website	HTTP
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“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
|--|-------------------------------------|
- |   |                                     |
|---|-------------------------------------|
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
|---|-------------------------------------|
- |   |                                     |
|---|-------------------------------------|
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

<b>(2005) Price Cap Carrier Additional Documentation</b> <b>Data Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	150113
<015> Study Area Name	WINDSTREAM RED JACKT
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Jeff Heacox
<035> Contact Telephone Number - Number of person identified in data line <030>	5017485390 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?  Name of Attached Document Listing Required Information
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?  Name of Attached Document Listing Required Information
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

Yes

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

No

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010> Study Area Code 150113

<015> Study Area Name WINDSTREAM RED JACKT

<020> Program Year 2018

<030> Contact Name - Person USAC should contact regarding this data Jeff Heacox

<035> Contact Telephone Number - Number of person identified in data line <030> 5017485390 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> jeff.l.heacox@windstream.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan  
Carrier certifies to 54.313(f)(1)(iii)

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

<b>(3005) Rate Of Return Carrier Additional Documentation (Continued)</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	150113
<015> Study Area Name	WINDSTREAM RED JACKET
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<039> Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

**Financial Data Summary**

(3027) Revenue	<input type="text"/>
(3028) Operating Expenses	<input type="text"/>
(3029) Net Income	<input type="text"/>
(3030) Telephone Plant In Service(TPIS)	<input type="text"/>
(3031) Total Assets	<input type="text"/>
(3032) Total Debt	<input type="text"/>
(3033) Total Equity	<input type="text"/>
(3034) Dividends	<input type="text"/>

<010>	Study Area Code	150113
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

**If yes to 4003A, please provide a response for 4003B.**

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

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**Broadband Deployment Locations – FCC 14-98 (paragraph 80)**

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information

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**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information

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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	150113
<b>&lt;015&gt;</b>	Study Area Name	WINDSTREAM RED JACKT
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<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: WINDSTREAM RED JACKT	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/13/2017
Printed name of Authorized Officer: Tim Loken	
Title or position of Authorized Officer: Director	
Telephone number of Authorized Officer: 5017487442 ext.	
Study Area Code of Reporting Carrier: 150113	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	150113
<b>&lt;015&gt;</b>	Study Area Name	WINDSTREAM RED JACKT
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<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	jeff.l.heacox@windstream.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

## Attachments







Line 510-Description of Compliance with Service Quality Standards and Consumer Protection:

**Voice Certification:**

Windstream certifies that we comply with applicable service quality standards and consumer protection rules as required by the state regulatory commission and the Federal Communications Commission.

1. Service quality metrics are monitored and reviewed each month
2. Windstream is founded on integrity. All employees are required to complete a course on integrity each year.
3. Windstream employees have at their disposal our People Practices Overview Course which is a general overview of the guidelines that govern all Windstream employees.
4. Windstream's Customer Proprietary Network Information (CPNI) training manual documents when personnel are, and are not, authorized to use CPNI. This Manual constitutes Windstream's policies and procedures related to CPNI. All employees are required to follow the policies and procedures specified in this manual.
5. Windstream IT has in place numerous measures to insure the integrity of the network and the customer data that resides on the network. The network is monitored 24/7 and periodic reviews of the security processes are performed.
6. Windstream makes every attempt to achieve one-call resolution on customer invoice issues.
7. Windstream has developed a program to help spot the Red Flags of identity theft, which is consistent with the FTC's guidelines, and has procedures in place to mitigate the potential damage of identity theft.
8. Windstream has implemented our Customer Account Protection Plan (CAPP) to provide increased security against unauthorized changes (cramming) to customer accounts. This plan requires third-party carriers to have a customer's Passcode to change the customer's service or access the customer's account information.

Line 510-Continued:

**Broadband Certifications**

Windstream certifies that it complies with applicable service quality standards, if any, and consumer protection rules as required by the state regulatory commission and the Federal Communications Commission.

Specifically:

1. All Windstream employees are required to complete a security awareness training every year.
2. Windstream's Customer Proprietary Network Information (CPNI) training manual documents when personnel are, and are not, authorized to use CPNI. This Manual constitutes Windstream's policies and procedures related to CPNI. All employees are required to follow the policies and procedures specified in this manual.
3. Windstream IT has in place numerous measures to insure the integrity of the network and the customer data that resides on the network. The network is monitored 24/7 and periodic reviews of the security processes are performed.
4. Windstream has developed a program to help spot the Red Flags of identity theft, which is consistent with the FTC's guidelines, and has procedures in place to mitigate the potential damage of identity theft.

## **Line 610 – Description of Functionality in Emergency Situations**

Voice:

Windstream certifies that it is compliant with applicable rules on service provision in emergency situations. Windstream central offices are designed to withstand limited commercial power failures through the use of emergency batteries supplemented by on site or portable generators. Windstream personnel perform routine maintenance on this essential equipment based on the manufacturer's service recommendations and Windstream service practices. The backup batteries are load tested routinely and the on site generators are tested monthly.

Windstream's network is engineered to handle traffic spikes that can occur as the result of emergency situations. The network is monitored 24/7 by our Network Operations Center ensuring quick response whenever and where ever it is needed. Network redundancy is built into our network where ever possible to ensure alternate routing is available when necessary.

Broadband:

Windstream certifies that it is compliant with applicable rules on service provision in emergency situations. Windstream central offices are designed to withstand limited commercial power failures through the use of emergency batteries supplemented by on site or portable generators. Windstream personnel perform routine maintenance on this essential equipment based on the manufacturer's service recommendations and Windstream service practices. The backup batteries are load tested routinely and the on site generators are tested monthly.

**AFFIDAVIT**

STATE OF ARKANSAS        )

)

COUNTY OF PULASKI        )

I, Tim Loken, being duly sworn upon oath, do hereby depose and state as follows:

I am an officer of the reporting carriers, as listed on the Carrier List; my responsibilities include ensuring the accuracy of the rates reported in this report.

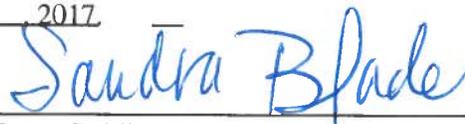
I hereby certify pursuant to the requirements under 47 C.F.R. §54.313(a)(10) that:

- (1) The pricing of Windstream's voice services is no more than two standard deviations above the national average urban rate for voice service.



\_\_\_\_\_  
Tim Loken, Director – Regulatory Reporting

Subscribed and sworn to before me this 6 of June, 2017



\_\_\_\_\_  
Notary Public

My Commission expires:

August 2, 2026



## Carrier List

STATE	Legal Entity	SAC	Certify fixed voice service is no more than two standard deviations above the applicable national average urban rate. Yes/No
AL	Windstream Alabama, LLC	250302	Yes
AR	Windstream Arkansas, LLC	401691	Yes
FL	Windstream Florida, LLC	210336	Yes
GA	Windstream Georgia, LLC	220357	Yes
GA	Windstream Georgia Telephone, LLC	220364	Yes
GA	Windstream Standard, LLC	220386	Yes
GA	Windstream Accucomm Telecommunications, LLC	220395	Yes
GA	Georgia Windstream, LLC	223036	Yes
GA	Windstream Georgia Communications, LLC	223037	Yes
IA	Windstream Iowa Communications, LLC	351167	Yes
IA	Windstream Iowa Communications, LLC	351170	Yes
IA	Windstream Iowa Communications, LLC	351178	Yes
IA	Windstream Montezuma, LLC	351248	Yes
KY	Windstream Kentucky West, LLC	260402	Yes
KY	Windstream Kentucky East, LLC	269690	Yes
KY	Windstream Kentucky East, LLC	269691	Yes
MN	Windstream Lakedale, Inc.	361414	Yes
MN	Windstream Lakedale, Inc.	361482	Yes
MO	Windstream Missouri, LLC	421885	Yes
MS	Windstream Mississippi, LLC	280453	Yes
NC	Windstream Concord Telephone, LLC	230474	Yes
NC	Windstream North Carolina, LLC	230476	Yes
NC	Windstream Lexcom Communications, LLC	230483	Yes
NE	Windstream Nebraska, Inc.	371568	Yes
NM	Valor Telecommunications of Texas, LLC	491164	Yes
NM	Valor Telecommunications of Texas, LLC	491193	Yes
NY	Windstream New York, Inc.	150106	Yes
NY	Windstream New York, Inc.	150109	Yes
NY	Windstream New York, Inc.	150113	Yes
OH	Windstream Ohio, LLC	300665	Yes
OH	Windstream Western Reserve, LLC	300666	Yes
OK	Valor Telecommunications of Texas, LLC	431165	Yes

STATE	Legal Entity	SAC	Certify fixed voice service is no more than two standard deviations above the applicable national average urban rate. Yes/No
OK	Windstream Oklahoma, LLC	431965	Yes
OK	Oklahoma Windstream, LLC	432011	Yes
PA	Windstream Buffalo Valley, Inc.	170151	Yes
PA	Windstream Conestoga, Inc.	170162	Yes
PA	Windstream D & E, Inc.	170165	Yes
PA	Windstream Pennsylvania, LLC	170176	Yes
SC	Windstream South Carolina, LLC	240517	Yes
TX	Valor Telecommunications of Texas, LLC	441163	Yes
TX	Windstream Communications Kerrville, LLC	442097	Yes
TX	Windstream Sugar Land, LLC	442147	Yes
TX	Texas Windstream, LLC	442153	Yes

**FCC Form 481**

**Line 1030 - Description of Broadband Comparability Compliance**

Windstream offers the following broadband plans:

<b>Download Speeds</b>	<b>Upload Speeds</b>	<b>Usage Allowance</b>	<b>Rate</b>	<b>Benchmark</b>
6MB	1MB	Unlimited	\$ 59.99	\$ 71.27
12MB	1.5MB	Unlimited	\$ 64.99	\$ 80.56
16MB	1.5MB	Unlimited	\$ 64.99	\$ 84.35
20MB	1.5MB	Unlimited	\$ 64.99	\$ 87.28
25MB	4MB	Unlimited	\$ 64.99	\$ 90.67
50MB	8MB	Unlimited	\$ 64.99	\$ 100.10

Windstream's broadband pricing is well below the relevant benchmark rates.

## Carrier List

STATE	Legal Entity	SAC	Certify Windstream's broadband pricing is below the relevant benchmark rate.  Yes/No
AL	Windstream Alabama, LLC	250302	Yes
AR	Windstream Arkansas, LLC	401691	Yes
FL	Windstream Florida, Inc.	210336	Yes
GA	Windstream Georgia, LLC	220357	Yes
GA	Windstream Georgia Telephone, LLC	220364	Yes
GA	Windstream Standard, LLC	220386	Yes
GA	Windstream Accucomm Telecommunications, LLC	220395	Yes
GA	Georgia Windstream, LLC	223036	Yes
GA	Windstream Georgia Communications, LLC	223037	Yes
IA	Windstream Iowa Communications, Inc.	351167	Yes
IA	Windstream Iowa Communications, Inc.	351170	Yes
IA	Windstream Iowa Communications, Inc.	351178	Yes
IA	Windstream Montezuma, Inc.	351248	Yes
KY	Windstream Kentucky West, LLC	260402	Yes
KY	Windstream Norlight, Inc.	269004	Yes
KY	Windstream Kentucky East, LLC	269690	Yes
KY	Windstream Kentucky East, LLC	269691	Yes
MN	Windstream Lakedale, Inc.	361414	Yes
MN	Windstream Lakedale, Inc.	361482	Yes
MO	Windstream Missouri, Inc.	421885	Yes
MS	Windstream Mississippi, LLC	280453	Yes
NC	Windstream Concord Telephone, Inc.	230474	Yes
NC	Windstream North Carolina, LLC	230476	Yes
NC	Windstream Lexcom Communications, Inc.	230483	Yes
NE	Windstream Nebraska, Inc.	371568	Yes
NM	Valor Telecommunications of Texas, LLC	491164	Yes
NM	Valor Telecommunications of Texas, LLC	491193	Yes
NY	Windstream New York, Inc.	150106	Yes
NY	Windstream New York, Inc.	150109	Yes
NY	Windstream New York, Inc.	150113	Yes
OH	Windstream Ohio, Inc.	300665	Yes
OH	Windstream Western Reserve, Inc.	300666	Yes
OK	Valor Telecommunications of Texas, LLC	431165	Yes

STATE	Legal Entity	SAC	Certify Windstream's broadband pricing is below the relevant benchmark rate. Yes/No
OK	Windstream Oklahoma, LLC	431965	Yes
OK	Oklahoma Windstream, LLC	432011	Yes
PA	Windstream Buffalo Valley, Inc.	170151	Yes
PA	Windstream Conestoga, Inc.	170162	Yes
PA	Windstream D & E, Inc.	170165	Yes
PA	Windstream Pennsylvania, LLC	170176	Yes
SC	Windstream South Carolina, LLC	240517	Yes
TN	Windstream Norlight, Inc.	299008	Yes
TX	Valor Telecommunications of Texas, LLC	441163	Yes
TX	Windstream Communications Kerrville, LLC	442097	Yes
TX	Windstream Sugar Land, Inc.	442147	Yes
TX	Texas Windstream, Inc.	442153	Yes

## LIFELINE SERVICE

### Definition

Lifeline Service is a retail local service offering available to qualifying low-income residential customers and is provided pursuant to the FCC Order 12-11 released on February 6, 2012. Funding for Lifeline Service is obtained from a universal service support mechanism to which all telecommunications carriers that provide interstate telecommunications services contribute on an equitable and nondiscriminatory basis. Lifeline is a government benefit program, and consumers who willfully make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

### Discounts

- A. The following credits will apply for customers deemed eligible for Lifeline assistance:  
Monthly Credit

Federal Credit	\$9.25
State Credit to Residential Access Line	Varies by state
Residents of federally recognized tribal lands may Receive an additional reduction up to	\$25.00

- B. The monthly discounted residential rate for qualified low-income customers may not be reduced below zero. Therefore, the credit amount defined in A. above shall not exceed the total of the subscriber line charge and the customer's normal residential local exchange service rate.

### General

- A. The Company shall offer toll blocking to all qualifying low income customers at no charge at the time such customers subscribe to Lifeline service. If the customer voluntarily elects to receive toll blocking, the service shall become part of the customer's Lifeline service and all service deposits will be waived.
- B. Lifeline program rate reductions do not apply to long distance service or any other services (i.e., Custom Calling, CLASS, construction charges, etc.) which may or may not be tariffed. Customers may obtain such services, where available, at their discretion, although the Lifeline program rate reduction does not apply.
- C. Lifeline program service will not be available on a retro-active basis.

### Eligibility Requirements

- A. The Lifeline program rate reduction shall apply to one (1) benefit per residential household, at the subscriber's principal place of residence. Service is limited to only one Service per qualified customer or household; within this section, 'household' is defined as "any individual or group of individuals who are living together at the same address as one economic unit," with an 'economic unit' defined as, "all adult individuals contributing to and sharing in the income and expenses of a household."
- B. The service must be provided in the eligible customer's name.
- C. An applicant whose household income is at or below 135% of the Federal Poverty Guidelines, or they can provide certification or authorize agency verification of their participation in one of the following programs:

Medicaid  
Supplemental Nutrition Assistance Program (SNAP)  
Supplemental Security Income (SSI)  
Federal Public Housing Assistance  
Veteran's Pension/Survivor's Pension benefit

D. The customer must sign, under penalty of perjury, a document certifying:

He/she receive(s) benefits from one of the program(s) identified above or

He/she's annual household income is at or below 135 percent of the Federal Poverty Guidelines.

He/she must notify their service provider within 30 days if he/she no longer meets the program or income eligibility criteria

He/she must acknowledge that the household only receives one Lifeline Program benefit

He/she acknowledges the data provided on this application form is true and correct to the best of their knowledge.

He/she agrees the company may transmit this data to the Administrator of the National Lifeline Accountability Database to ensure the proper administration of the Lifeline Program. He/she understands that if they refuse to have this information transmitted to the Administrator, they will be denied Lifeline Program benefits.

He/she acknowledges that falsifying information to obtain Lifeline Program benefits is punishable by law and can result in fines, imprisonment, de-enrollment, or being barred from the program.

He/she may be required to recertify eligibility at any time and failure to recertify eligibility for the Lifeline Program will result in removal from the Lifeline Program and termination of Lifeline benefit.

He/she if seeking to qualify for Lifeline as an eligible resident of Tribal Land, he/she certifies they live on Tribal Land as defined in Section 54.400(e) of Lifeline rules.

- E. Customers qualifying for Lifeline Service are offered the services or functionalities enumerated in 47 Code of Federal Regulations §54.101 (a) (1)-(8) (relating to Supported Service for Rural, Insular and High Cost Areas).
- F. The method for verification of the eligibility criteria set forth above shall be a national eligibility verifier. Until the national eligibility verifier has been established to verify eligibility the verification method will be self-certification by the recipients of the eligible programs. The Company has certification processes in place which at the time of enrollment requires a documentation review that confirms the consumer's household eligibility. The Company will retain copies of the self-certification records of both the applicant and the Company. A Company officer will attest that these procedures are in place.
- G. The Company will annually verify the continued eligibility pursuant to the FCC Order 12-11 released on February 6, 2012.

#### Credits and Deposits

- A. The credit verification procedures available for all applicants who apply for service with the Company will also be used for applicants who apply for service under the Lifeline program.
- B. The deposit standards used for all applicants who apply for service with the Company will also be used for applicants who apply for service under the Lifeline Program with the exception that deposit requirements will be waived for Lifeline Service applicants who voluntarily elect to subscribe to toll blocking service.

#### Service Charges

- A. Service charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
- B. A service order deposit is not applicable to customers who elect toll blocking when initiating Lifeline service.

C. A service order charge does apply when:

At the time Lifeline Service billing is initiated, eligible residential local exchange access service customers also request additional optional calling features such as Custom Calling Features, CLASS features, etc.

Any subsequent moves or changes after the initial connection to Lifeline service are requested by the customer.

Service is established for new residential applicants (those without existing local exchange access service) eligible for Lifeline Service.

Payments and Disconnection of Service

- A. Lifeline service may not be disconnected for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for nonpayment of toll charges.
- B. Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.

Windstream Residential Service Rates by Service Area

Rates shown with and without state and federal Lifeline discounts applied

Year	SAC	Without Lifeline Discounts		With Lifeline Discounts	
		Low	High	Low	High
2016	150113	\$17.59	\$21.49	\$1.00	\$10.24

**Rate Floor Data**

Redacted for Public Inspection

**RATE FLOOR DATA COLLECTION - OMB Control Number 3060-0986**

**Block 1 - Contact Information**

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE
1	Carrier Study Area Code	6 numeric digits	150113
2	Carrier Study Area Name	alpha characters	Windstream New York, Inc.
3	Service Provider Identification Number	9 numeric digits	143030766
4	<b>Residential Local Service Charge Effective Date</b>	mm/dd/yyyy	06/01/2016
5	Contact Name	alpha characters	Jeff Heacox
6	Contact Telephone Number (include area code)	9 numeric digits	(501) 748-5390
7	Sheet number	numeric digit(s)	1
8	Total Number of Sheets	numeric digit(s)	1

**Block 2 - Residential Local Service Rates, Fees, and Line Counts**

	Column 1 Residential Local Service Charge	Column 2 State Subscriber Line Charge	Column 3 State Universal Service Fee	Column 4 Mandatory Extended Area Service Charge	Column 5 Loops
9	\$ 10.00	\$ -	\$ 1.07	\$ -	
10	\$ 14.99	\$ -	\$ 1.61	\$ -	
11	\$ 14.99	\$ -	\$ 1.07	\$ -	
12					
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING CERTIFICATION ON ITS OWN BEHALF:**

**Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data**

I certify, that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	Windstream Holdings, Inc.	
Signature of Authorized Officer		Date 6/12/2017
Printed name of Authorized Officer	Timothy P. Loken	
Title or position of Authorized Officer	Director - Regulatory Reporting	
Telephone number of Authorized Officer:	( 501 ) 748 - 7442 , ext. -----	
Study Area Code of Reporting Carrier	See Attached List	07/01/2017

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

SAC	STATE	Legal Entity
150106	NY	Windstream New York, Inc.
150109	NY	Windstream New York, Inc.
150113	NY	Windstream New York, Inc.
170151	PA	Windstream Buffalo Valley, Inc.
170162	PA	Windstream Conestoga, Inc.
170165	PA	Windstream D & E, Inc.
170176	PA	Windstream Pennsylvania, LLC
210336	FL	Windstream Florida, LLC
220357	GA	Windstream Georgia, LLC
220364	GA	Windstream Georgia Telephone, LLC
220386	GA	Windstream Standard, LLC
220395	GA	Windstream Accucomm Telecommunications, LLC
223036	GA	Georgia Windstream, LLC
223037	GA	Windstream Georgia Communications, LLC
230474	NC	Windstream Concord Telephone, LLC
230476	NC	Windstream North Carolina, LLC
230483	NC	Windstream Lexcom Communications, LLC
240517	SC	Windstream South Carolina, LLC
250302	AL	Windstream Alabama, LLC
260402	KY	Windstream Kentucky West, LLC
269690	KY	Windstream Kentucky East, LLC
269691	KY	Windstream Kentucky East, LLC
280453	MS	Windstream Mississippi, LLC
300665	OH	Windstream Ohio, LLC
300666	OH	Windstream Western Reserve, LLC
351167	IA	Windstream Iowa Communications, LLC
351170	IA	Windstream Iowa Communications, LLC
351178	IA	Windstream Iowa Communications, LLC
351248	IA	Windstream Montezuma, LLC
361414	MN	Windstream Lakedale, Inc.
361482	MN	Windstream Lakedale, Inc.
371568	NE	Windstream Nebraska, Inc.
401691	AR	Windstream Arkansas, LLC
421885	MO	Windstream Missouri, LLC
431165	OK	Valor Telcommunications of Texas, LLC
431965	OK	Windstream Oklahoma, LLC
432011	OK	Oklahoma Windstream, LLC
441163	TX	Valor Telcommunications of Texas, LLC
442097	TX	Windstream Communications Kerrville, LLC
442147	TX	Windstream Sugar Land, LLC.
442153	TX	Texas Windstream, LLC.
491164	NM	Valor Telcommunications of Texas, LLC
491193	NM	Valor Telcommunications of Texas, LLC